## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: Chapter 11

Case No. 24-11967 (JKS) BIG LOTS, INC., et al.,

(Jointly Administered)

Debtors.<sup>1</sup> Obj. Deadline: 3/21/25 at 4:00 p.m. (ET) Hrg. Date: Only if objections are filed

NOTICE OF FOURTH MONTHLY FEE APPLICATION OF MCDERMOTT WILL & EMERY LLP, COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM JANUARY 1, 2025 THROUGH JANUARY 31, 2025

**PLEASE TAKE NOTICE** that on February 28, 2025, the Official Committee of Unsecured Creditors (the "Committee") of Big Lots, Inc. and its affiliated debtors and debtors in possession (collectively, the "Debtors") in the above captioned chapter 11 cases, by and through its undersigned counsel, filed with the United States Bankruptcy Court for the District of Delaware (the "Court") the Fourth Monthly Fee Application of McDermott Will & Emery LLP, Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period From January 1, 2025 Through January 31, 2025 (the "Application"), which seeks approval of professional services rendered to the Committee in the amount of \$236,175.60 (80% of \$295,219.50), together with reimbursement of expenses in the amount of \$3,886.71.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Application are required to be filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served on the following, so as to be received no later than 4:00 p.m. (ET) on March 21, 2025 (the "Objection Deadline"): (i) the Debtors, c/o Big Lots, Inc., 4900 E, Dublin-Granville Road, Columbus, OH 43081, Attn: Ronald A. Robins (rrobins@biglots.com); (ii) counsel to the Debtors, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, NY 10017, Attn: Brian M. Resnick, Esq., Adam L. Shpeen, Esq., Stephen D. Piraino, Esq., and Ethan Stern, Esq. (notice.biglots@davispolk.com); (iii) Delaware counsel to the Debtors, Morris, Nichols, Arsht &

The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors' corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Tunnell LLP, 1201 N. Market Street, 16th Floor, Wilmington, DE 19801, Attn: Robert J. Dehney, Sr., Esq., Andrew R. Remming, Esq., Daniel B. Butz, Esq., Tamara K. Mann, Esq., and Casey B. Sawyer, Esq. (biglots.mnat@morrisnichols.com); (iv) counsel to the ABL Agent, Choate Hall, & Stewart, LLP, 2 International Place, Boston, MA 02110, Attn: John Ventola (jventola@choate.com), Jonathan Marshall (jmarshall@choate.com), and Jacob Lang (jslang@choate.com); (v) counsel to the Term Agent, Otterbourg P.C., 230 Park Avenue, New York, NY 10169, Attn: Chad B. Simon (csimon@otterbourg.com), James V. Drew (jdrew@otterbourg.com), and Sarah L. Hautzinger (shautzinger@otterbourg.com); (vi) counsel to the Official Committee of Unsecured Creditors, McDermott Will & Emery LLP, One Vanderbilt Avenue, New York, NY 10017, Attn: Darren Azman, Esq. (dazman@mwe.com) and Kristin Going, Esq. (kgoing@mwe.com); (vii) Delaware counsel to the Official Committee of Unsecured Creditors, Cole Schotz P.C., 500 Delaware Avenue, Suite 1410, Wilmington, DE 19801, Attn: Esq. (jalberto@coleschotz.com) and Stacy Alberto, Newman, (snewman@coleschotz.com); and (viii) the U.S. Trustee, Caleb Boggs Federal Building, 844 King Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Linda Casev (linda.casey@usdoj.gov).

**PLEASE TAKE FURTHER NOTICE** that pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Docket No. 519], if no objections are filed and served in accordance with the above procedures, the Debtors will be authorized to pay 80% of the requested fees and 100% of the requested expenses, without further order of the Court.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE APPLICATION WILL BE HELD, ONLY IF AN OBJECTION IS TIMELY FILED, OR THE COURT DIRECTS OTHERWISE, AT A DATE AND TIME TO BE SCHEDULED BEFORE THE HONORABLE J. KATE STICKLES, 5TH FLOOR, COURTROOM NUMBER 6, UNITED STATES BANKRUPTCY JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, WILMINGTON, DELAWARE 19801.

[Remainder of Page Intentionally Left Blank]

Dated: February 28, 2025 Wilmington, Delaware

## COLE SCHOTZ P.C.

## /s/ Justin R. Alberto

Justin R. Alberto (No. 5126) Stacy L. Newman (No. 5044) 500 Delaware Avenue, Suite 1410

Wilmington, DE 19801 Tel: (302) 652-3131 Fax: (302) 652-3117

Email: jalberto@coleschotz.com snewman@coleschotz.com

-and-

Sarah A. Carnes (admitted *pro hac vice*) 1325 Avenue of the Americas, 19<sup>th</sup> Floor New York, NY 10019

Tel: (212) 752-8000 Fax: (212) 752-8393

Email: scarnes@coleschotz.com

-and-

## MCDERMOTT WILL & EMERY LLP

Darren Azman (admitted *pro hac vice*) Kristin K. Going (admitted *pro hac vice*) Stacy Lutkus (admitted *pro hac vice*) Natalie Rowles (admitted *pro hac vice*) One Vanderbilt Avenue

New York, NY 10017 Tel: (212) 547-5400 Fax: (212) 547-5444 Email: dazman@mwe.com

> kgoing@mwe.com salutkus@mwe.com nrowles@mwe.com

Counsel to the Official Committee of Unsecured Creditors